

App. No. 09/846,681  
Amendment Dated: November 12, 2004  
Reply to Office Action of August 11, 2004

### REMARKS/ARGUMENTS

Claims 1-25 are pending in the Application. The Office Action rejected Claims 1-25 under 35 U.S.C. 103(a) as being unpatentable over Brown, Don, US patent application publication no. US 2002/0156757 (hereinafter "Brown") in view of Valainis et al., US patent No. 6,389,582 B1 (hereinafter "Valainis"). Claims 1, 13, and 24 have been amended to clarify the invention. No new matter has been added.

Applicants assert that the claims may not be modified in the manner suggested. Furthermore, even if for argument sake such modifications were possible, the modifications still fail to teach all the limitations of the claims. Applicants respectfully request reconsideration and allowance of all pending claims in view of the following arguments.

The Office Action states on page 3, that Brown discloses a method and system for "[d]etermining thermal characteristics for a set of circuit components in design [0063] to [0065] for thermal simulation," and "[p]erforming thermal simulation for the design ([0055] [0076], [0083], for example)." Applicants respectfully disagree. Brown discloses a product design system in which vendor-supplied databases are downloaded to a designer's workstation which may then be accessed by tools stored on the designer's workstation (See Abstract and FIGURE 1). Brown and Valainis, alone, or in combination, do not disclose what is claimed in the present invention.

As amended, Claim 1 recites, in part "performing a thermal simulation of the circuit based on the determined set of thermal characteristics, wherein the thermal simulation is

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performed on a computer that is different from a computer the user is using to access the network." Claims 13 and 24 have been similarly amended.

The Office Action also refers to what is disclosed in the Brown publication as a "Brown thermal simulator" (Page 3, paragraph 4, 8-11 Office Action). Brown is not a thermal simulator. Brown discloses that the "vendor-supplied data can then be imported from the vendor-supplied database into any of the design tools." (See Abstract) FIGURE 1 of Brown illustrates vendor tools stored on workstation 10. Additionally, Brown teaches away from "thermally simulating a circuit over a network" as disclosed in Claim 1 (See paragraph 54 and 55). Brown discloses obtaining vendor-supplied data that is needed by the design tool. Brown merely discloses obtaining data to be plugged into the tools located on the user's workstation and not thermally simulating a circuit over a network. Paragraph 63 of Brown states that the "vendor supplied databases 14a, 14b, can be **imported** directly into the EDA design tool 20." (emphasis added) This means that the data and the design tools (as shown in FIGURE 1 of Brown) are stored on the user's workstation. There is no simulation performed over a network. All of the design data and tools are stored on the user workstation. Brown only discloses that the user may access the Internet, or some other network, to access the tools and databases such that they may be distributed to the workstation. (See paragraph 64). This is further confirmed in paragraph 65 where Brown states that "[o]nce the standardized vendor-supplied data is downloaded from the vendor database 40 to the workstation, the data can be transported to any of the EDA tools 20.

For at least the reasons discussed above, the Applicants respectfully submit that independent Claims 1, 13, and 24, as amended, are not obvious in view of the cited references,

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and are, therefore, allowable. Claims 2-12, 14-18, and 25 are dependent from valid base claims, and therefore include the limitations of the base claims. Therefore, Claims 2-12, 14-18, and 25, are allowable for at least the same reasons.

With regard to Claim 19, Brown does not disclose a server "performing a thermal simulation of the circuit based on the determined thermal characteristic." As discussed above, Brown discloses that simulations are performed on the designer's workstation and are not performed across the network. For at least this reason, plus the reasons discussed above, the Applicants respectfully submit that independent Claims 19 is not obvious in view of the cited references and is therefore allowable. Similarly, Claims 20-23, which depend from Claim 19 are allowable for at least the same reasons.


The Office Action states that "Brown does not expressly disclose the thermal analysis for final component placement on board layout as cited in the preamble" but states that this is well known in the art. The Applicant respectfully disagrees that this is well known in the art.

In view of the foregoing amendments and remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application, the Examiner is requested to contact the undersigned attorney for the applicant at the telephone number provided below.

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Respectfully submitted,

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